

FILED  
U.S. DISTRICT COURT

2017 SEP 18 A 10:56

DISTRICT OF UTAH

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IN THE UNITED STATES DISTRICT COURT  
 DISTRICT OF UTAH, CENTRAL DIVISION

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UNITED STATES OF AMERICA,	Case No.
Plaintiff,	MISDEMEANOR INFORMATION
vs.	COUNTS I-II:
YOUNG LIVING ESSENTIAL OILS, L.C.	16 U.S.C. §§ 1538(c), (g), 1540(b)(1)
Defendant.	(engaging in trade contrary to the Convention on International Trade in Endangered Species);
	16 U.S.C. §§ 3372(a)(1), 3372(a)(2)(B), 3372(a)(4) and 3373(d)(2) (trafficking in illegally sourced plants)
	Judge Dustin B. Pead

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The United States Attorney charges:

**COUNT I**

**16 U.S.C. §§ 1538(c) and (g), 1540(b)(1)**  
**(Engaging in Trade Contrary to CITES)**

During approximately December 2015, in the Central Division of the District of Utah,

YOUNG LIVING ESSENTIAL OILS, L.C.

Case: 2:17-cr-00541  
 Assigned To : Pead, Dustin B.  
 Assign. Date : 9/18/2017  
 Description: USA v. Young Living  
 Essential Oils

Defendant herein, did knowingly engage in trade in a specimen contrary to the provisions of the Convention on International Trade in Endangered Species, and cause and solicit another to do so, in that defendant knowingly exported and caused and solicited another to export, spikenard (*Spikenard Nardostachys grandiflora* or *jatamansi*) without the required re-export certificate, all in violation of the Endangered Species Act of 1973, Title 16, United States Code, Sections 1538(c) and (g) and 1540(b)(1).

**COUNT II**

**16 U.S.C. §§ 3372(a)(2)(B), 3372(a)(4), and 3373(d)(2)  
(Trafficking in Illegally Sourced Plants – Underlying Foreign Law)**

Between approximately June 2010 and October 2014, in the Central Division of the District of Utah and elsewhere,

**YOUNG LIVING ESSENTIAL OILS, L.C.**

Defendant herein, did knowingly acquire, purchase, import, transport and receive, and attempt to acquire, purchase, import, transport and receive said plants in interstate and foreign commerce, when in the exercise of due care Defendant should have known that said plants were taken and transported in violation of and in a manner unlawful under foreign laws, and the plants were in fact taken and transported in violation of the laws and regulations of Peru that protect plants, that regulate the taking of plants without, or contrary to, required authorization, and that govern the export or transshipment of plants, specifically, Supreme Decree No. 014-2001-AG, Article 363, as amended by 005-2003-AG, Article 2, all in violation of Title 16, United States Code, Sections 3372(a)(2)(B), 3372(a)(4) and 3373(d)(2).

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